

11 June 2021

Mr Ron Grasso
Acting Head, Safety Reform
National Transport Commission
Level 3, 600 Bourke Street
Melbourne VIC 3000

Email: rgrasso@ntc.gov.au

Dear Mr Grasso

Re: Assessing Fitness to Drive (AFTD) Review 2021

Audiology Australia (AudA) welcomes the opportunity to review the National Transport Commission's (Commission) updated draft AFTD guidelines and notes the planned release of the updated guidelines in 2021.

AudA is the peak member association for the profession of audiology, representing over 3,000 practising audiologists across Australia. AudA members provide a wide range of hearing services and supports to all members of the community, including diagnostic hearing assessments to determine a person's fitness to drive.

AudA acknowledges the suitability of the changes in the updated draft guidelines in regard to hearing loss and deafness and the following updates in the draft guidelines which were guided by AudA's recommendations to the Commission in November 2020:

- amendment to the guideline's definition of an audiologist from the previous definition "an audiologist is a person registered with Audiology Australia" to the amended definition "an audiologist is a person accredited as such by Audiology Australia".
- removal of the term 'medical' when referring to the assessments which may be undertaken by audiologists to determine a person's fitness to drive.

We also acknowledge the Commission's consideration of AudA's recommendation to include vestibular and balance assessment as part of the driving screening assessment procedure and note the insufficient literature evidence as outlined in the Review Report which informed the Commission's decision to exclude this recommendation in the updated draft guidelines.

AudA members also provided feedback in regard to meeting the hearing standard with hearing aids via aided thresholds. Our members have commented that free field testing – which requires a calibrated booth and equipment and a known testing location to avoid ambient noise and standing waves – can result in extra time and costs, which are incurred by clients and hearing practitioners who have to relocate to a clinic with the appropriate equipment in order to perform the testing. In addition, multiple hearing aid factors, including noise reduction, feedback cancellation, compression times, directionality of microphones and volume control settings can easily impact on the measurements. AudA notes that testing the



aided performance of hearing aids using real ear measurements to ensure adequate amplification may be a more valid and modern approach that audiologists may use when assessing whether an aided person meets the hearing standard.

We would welcome the opportunity to discuss any aspect of our letter with you further. I can be contacted via Elissa Campbell, Advocacy and Policy Manager on (03) 9940 3900 or elissa.campbell@audiology.asn.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Barbra Timmer", with a horizontal line extending to the right.

Dr Barbra Timmer
President